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R E M A R K S

Reconsideration of the application in view of the following remarks is respectfully requested. No claims have been amended, added or canceled. Therefore, claims 1-16 are pending in the application.

Information Disclosure Statements

1. The Examiner indicated on sheet 2 of 2 of Applicant's modified PTO-1449 form, filed February 10, 2003, that reference AX entitled "Notification of Reasons for Refusal" was not considered. The Examiner provided no reason in the pending office action for such non-consideration.

Applicant has attached herewith a copy of the originally filed modified PTO-1449 form, along with an additional copy of the reference for consideration by the Examiner. Additionally, Applicant has attached a copy of the originally filed return receipt postcard stamped by the USPTO indicating receipt of the modified PTO-1449 and the reference. Applicant respectfully requests that the Examiner return a signed copy of the PTO-1449 for along with the next office communication indicating consideration by the USPTO. No fee is believed due.

2. Applicants submitted a supplemental information disclosure statement on October 16, 2003 including a supplemental modified PTO-1449 form. Applicants respectfully request the Examiner return a signed copy of the supplemental modified PTO-1449 form with the next office communication indicating consideration of the two cited references. No fee is believed due.

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Claim Rejections under 35 U.S.C. 103

Claims 1-16 stand rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 6,654,014 to Endo et al. ("Endo et al."). Applicant respectfully traverses these rejections.

Regarding independent claim 1, in the outstanding office action, the Examiner states that Column 17, lines 26-42 of Endo et al. teach "setup means for determining a setup point in said three dimensional field every time the position and moving direction of said object are calculated by said object position calculating means, while taking a setup point obtained at least in the last calculation into consideration" (Office Action mailed 03/25/2004, page 2).

The section of Endo et al. cited by the Examiner states:

"A bird's-eye view display method in the above case will be described with reference to FIG. 8, FIGS. 10A to 10C and FIGS. 16A to 16C. FIGS. 10A to 10C are diagrams showing a case of obtaining a bird's-eye view display in which both the current position and the destination are drawn on the same frame (field of view), and FIGS. 16A to 16C are diagrams showing a case of obtaining a bird's-eye view display of the same range as show in FIGS. 10A to 10C, in which the view point is set to a different position. A field of view (range to be drawn and displayed) 162 is shown in a map mesh 161 in FIGS. 10A and 16A, the view point position and the projection angle for obtaining the bird's-eye view are shown in FIGS. 10B and 16B, and the current position and the position of the destination in the obtained bird's-eye view display are shown in FIGS. 10C and 16C. Arrows indicated by dotted lines represent the direction from the current position to the destination."

Nowhere in the above recited section does Endo et al. teach or suggest "camera setup means for determining a setup point of said virtual camera in said three dimensional field every time the position and moving direction of said object are calculated

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by said object position calculating means, while taking a setup point obtained at least in the last calculation into consideration," such as is claimed by Applicant.

The Endo et al. reference describes the method of obtaining the bird's eye view display at Column 17, line 43 through Column 18, line 38. The "bird's eye view" of Endo et al. is calculated each time based upon a current position and a destination, such that the current position is displayed at the central lower side of the screen and the destination is displayed at the central upper side of the screen. A previous view point is never taken into consideration when calculating a current view point. This method simply does not teach or suggest taking a setup point obtained at least in the last calculation into consideration while determining a setup point of said virtual camera.

M.P.E.P section 2143.03 states "[t]o establish prima facie obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art." Therefore, a prima facie case of obviousness has not been established because the Examiner has not shown prior art references as required by the M.P.E.P. that teaches or suggests "camera setup means for determining a setup point of said virtual camera in said three dimensional field every time the position and moving direction of said object are calculated by said object position calculating means, while taking a setup point obtained at least in the last calculation into consideration."

Thus, Applicant respectfully submits that the rejection of independent claim 1 is overcome and is in condition for allowance. Furthermore, independent claims 8, 15 and 16 contain similar language to independent claim 1. Thus rejection of independent claims 8, 15 and 16 are overcome at least for the

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same reasons as indicated above with reference to independent claim 1.

Regarding dependent claim 2 the Examiner has indicated that all of the elements of claim 2 "would have been obvious in view of Edo's dependency of view point's position of the bird's-view display on the object's position and moving direction because the viewpoint's position and direction is equivalent to the position and direction of the virtual camera."

M.P.E.P section 2143 entitled "Basic Requirements of a *Prima Facie* Case of Obviousness" states:

"To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations."

The office action fails to establish any of the three requirements stated above in rejecting dependent claim 2. The Examiner has stated in conclusion that the elements of claim 2 would have been obvious. This simply does not establish a *prima facie* case of obviousness as required by M.P.E.P section 2143. Specifically, the office action fails to show anywhere in Endo et al. that teaches or suggests "means for settling a camera chasing point at a position higher by a predetermined value H than a position to the rear of said object from the position thereof by a distance K, the position being on a line which passes through a newly calculated position of said object by said object position calculating means and is parallel with a newly calculated moving

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direction of said object, and wherein said camera setup means settle a setup point of said virtual camera at a position approaching said camera chasing point from the setup point of said virtual camera obtained at least in the last calculation." Furthermore, the office action provides no motivation or suggestion as to why Endo et al. could be modified to settle a camera chasing point such as recited in claim 2. Thus, the rejection of claim 2 is overcome.

The Examiner has made similar conclusory statements to the rejection of claim 2 in rejecting claims 3-7 and 9-14. Thus, for the same reasons as stated above with reference to claim 2, the rejections of claims 3-7 and 9-14 are overcome because the Examiner has not made out a proper *prima facie* case of obviousness as required by M.P.E.P section 2143.

Accordingly, the rejections of Applicant's claims 1 through 16 must be withdrawn.

Fees

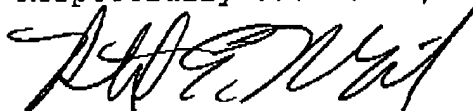
No fees are believed to be due.

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C O N C L U S I O N

By way of this response, Applicant has made a diligent effort to place the claims in condition for allowance. However, should there remain any outstanding issues that require adverse action, it is respectfully requested that the Examiner telephone Richard E. Wawrzyniak at (858) 552-1311 so that such issues may be resolved as expeditiously as possible.

Respectfully submitted,



Richard E. Wawrzyniak

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